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Hearing Date: September 14, 2020
Objection Deadline: September 4, 2020, on
or before 5:00 p.m., (EST)

Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Plaintiff,

v.

MICHAEL MANN, MERYL MANN and BAM
L.P.,

Defendants.

Adv. Pro. No. 10-04390 (CGM)

**NOTICE OF MOTION AND DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE
THE REPORT AND TESTIMONY OF LISA COLLURA**

PLEASE TAKE NOTICE that Defendants Michael Mann, Meryl Mann and BAM L.P.

(the "Defendants"), by their undersigned counsel, respectfully move and will move before the

Honorable Cecilia G. Morris, United States Bankruptcy Judge, presiding at the United States Bankruptcy Court, 355 Main Street, Poughkeepsie, New York on September 14, 2020, at 9:00 a.m., (EST) or as soon thereafter as counsel may be heard, for entry of an order relating to trial in the above-referenced adversary proceeding on: Defendants' Motion *in Limine* To Exclude the Report and Testimony of Lisa Collura and upon the Memorandum of Law in Support of the Motion and the Declaration of Arthur H. Ruegger in Support of the Motion.

PLEASE TAKE FURTHER NOTICE that written objections to the Motions must be filed with the Clerk of the United States Bankruptcy Court, by September 4, 2020, (with two courtesy copies delivered to the Chambers of the Honorable Cecelia G. Morris 355 Main Street, Poughkeepsie, New York 12601) and must be served upon Dentons US LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Arthur H. Ruegger and Carole Neville and via email addresses below so as to be received by the objection deadline.

PLEASE TAKE FURTHER NOTICE that all attorneys, parties in interest, or members of the public who wish to hear or observe the trial or attend the hearing shall send an email to Chambers (poughkeepsie.chambers@nysb.uscourts.gov) on or before 5:00 p.m., September 3, 2020, (EST). Attorneys, parties in interest, and the public must provide Chambers with the following information: (1) the first and last name of each person who will connect to the hearing; (2) a telephone number for any person connecting by telephone; (3) whether you are requesting a live or listen only line; (4) the law firm you are affiliated with (if applicable); and (5) and the client you represent (if applicable). To avoid multiple appearances at the hearing, parties will join with one device only. The Court will circulate by email prior to the hearing the Zoom link to such persons who wish to hear or observe the hearing via Zoom.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: August 27, 2020
New York, New York

DENTONS US LLP

By: /s/Arthur H. Ruegger
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